

EXHIBIT F

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

| | | |
|------------------------|---|---------------------------------|
| KEITH RANIERE, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 3:15-CV-0540-M |
| |) | [LEAD CASE] |
| v. |) | |
| |) | |
| MICROSOFT CORPORATION, |) | |
| |) | |
| Defendant |) | |
| |) | |
| |) | |
| KEITH RANIERE, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 3-15-CV-2298-M |
| |) | |
| v. |) | JURY TRIAL DEMANDED |
| |) | |
| AT&T CORP. |) | |
| |) | |
| Defendant |) | |

**DECLARATION OF KEITH RANIERE IN SUPPORT OF CAUSE AS TO WHY
THE CASE AGAINST AT&T SHOULD NOT BE DISMISSED**

I, Keith Raniere, declare as follows:

1. I am the plaintiff in this action. I am a resident of the State of New York.

The following is true and correct.

2. I was ready to testify at my deposition on January 22, 2016 in New York. I am told that Microsoft cancelled the deposition on January 20, 2016 after my lawyer had arrived in New York from California to represent me. Had I been deposed, I would have said the following.

3. In the 1990s, I invented a telecommunications process along with Saul Miodownick, Steve Danzig and Thomas Delaney, which led to the prosecution of patents and the issuance of patents as described in the Complaint.

4. Miodownick, Delaney, Danzig and I verbally agreed in the 1990s that corporations we would form would hold the patent for commercial exploitation and as a means to distribute shares of stock to share the profits, but that I would control the corporations. We also agreed at that time that if the corporation could not perform as expected, that I would own the patent outright.

5. Miodownick, Delaney, Danzig and I thus assigned our interest in the pending patent to a newly-formed Washington State corporation, Global Technologies, Inc. (“GTI”) at Exhibit A hereto. Exhibit A is a true and correct copy of a March 23, 1995 (first signed) document I signed along with those men. (I understand that Exhibits A and B will be affixed in front of my Exhibit F Declaration in the Appendix.)

6. We also agreed that my then-girlfriend, Toni Natalie, would hold my shares in GTI as a nominee for my interest. Today I do not recall the exact percentages

of the stock ownership, but my beneficial interest was a controlling one. I have been told that Washington attorney Alan Rubens has corporate formation documents showing that the shareholding interest of Natalie, Danzig and Delaney were 75 percent/12.5 percent/12.5 percent, and that they had executed a shareholders agreement whereby Natalie would transfer me her shares. These agreements are generally consistent with my understanding of the stock ownership in 1995 although, again, I do not recall today the exact percentages. I have not seen these Washington documents yet as I understand Rubens will not release them without a subpoena.

7. In 2014, one of my current lawyers prepared Exhibit B for me to sign based on information and direction received from Danzig, who received the information and direction from his attorney in the State of Washington. Exhibit B is a true and correct copy of three documents of consent or assignment, dated December 26, 2014, bearing my signature. This exhibit, among other things, says I own 100% percent of GTI. Delaney and Danzig previously told me, in substance, that they had no further interest in GTI and that I could have it. I am not aware of any other GTI shareholders. For almost 20 years I've acted under the assumption that I alone owned GTI as I invested more than \$75,000 into continuing the patent.

8. I have not authorized my lawyers to dismiss the case against AT&T. I was discouraged that I could not find corporate documents supporting my assignment authority and had authorized my attorneys to obtain a draft dismissal agreement for my

review and authorization. However, I do not agree to a dismissal in light of the documents apparently available in Washington State and based upon additional advice.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed at Waterford, New York, on January 26, 2016.



Keith Raniere 1/26/16